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*Attorneys for Non-Debtor Third-Party Miriam Gross*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

96 WYTHE ACQUISITION LLC,  
  
Debtor.

Chapter 11

Case No. 21-22108 (RDD)

**NOTICE OF NON-DEBTOR THIRD-PARTY MIRIAM GROSS' MOTION  
TO QUASH AND/OR MODIFY SUBPOENA DIRECTED TO  
AND SERVED UPON JPMORGAN CHASE BANK, N.A.**

**PLEASE TAKE NOTICE** that Miriam Gross, a non-debtor, third-party, by and through her undersigned counsel, will move before the Honorable Robert D. Drain, United States Bankruptcy Judge, at the United States Bankruptcy Court, on March 8, 2022 at 10:00 A.M. (ET), or as soon thereafter as counsel may be heard, for entry of an Order quashing and/or modifying the subpoena directed and served upon JPMorgan Chase Bank, N.A. ("**Chase**") demanding

production of bank statements and checks from Ms. Gross' personal account ending in 3556 and others (the "**Motion**").

**PLEASE TAKE FURTHER NOTICE** that the hearing will be held via Zoom. To attend the hearing virtually, participants are required to register their appearances by 4:00 p.m. the day before the hearing at <https://ecf.nysb.uscourts.gov/cgibin/nysbAppearances.pl>.

**PLEASE TAKE FURTHER NOTICE** that responses or objections to the Motion, shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, and shall be filed with the Bankruptcy Court, together with a copy to the Chambers of Judge Drain, and served so as to be received no later than 4:00 p.m. prevailing Eastern Time on March 1, 2022 (the "Objection Deadline"), upon (i) counsel for Miriam Gross, Saul Ewing Arnstein & Lehr LLP, One Riverfront Plaza, 1037 Raymond Blvd., Suite 1520, Newark, NJ 07102-5426, Attn: Stephen Ravin and A. Mayer Kohn (stephen.ravin@saul.com and mayer.kohn@saul.com); (iii) counsel for the Examiner Eric M. Huebscher, Locke Lord LLP, Brookfield Place, 200 Vesey Street, 20th Floor, New York, New York, 10281, Attn: Stephanie Wickouski and Chelsey Rosenbloom (swickouski@lockelord.com and chelsey.rosenbloom@lockelord.com); (iii) counsel for Benefit Street, Kramer Levin Naftalis & Frankel LLP, 1177 Avenue of the Americas, New York, NY 10036, Attn: Adam C. Rogoff and P. Bradley O'Neill (arogoff@kramerlevin.com and boneill@kramerlevin.com); (iv) co-counsel to the Debtor, Mayer Brown LLP, 1221 Avenue of the Americas, New York, NY 10020, Attn: Douglas Spelfogel and Leah Eisenberg (dspelfogel@mayerbrown.com and leisenberg@mayerbrown.com); (v) co-counsel to the Debtor, Backenroth Frankel & Krinsky, LLP, 800 Third Avenue, 11th Floor, New York, NY 10022, Attn: Mark A. Frankel (mfrankel@bfrklaw.com); (vi) the Office of the U.S. Trustee for the Southern District of New York,

201 Varick Street, Room 1006, New York, NY 10014, Attn: Greg Zipes, Esq.  
(greg.zipes@usdoj.gov); and (vii) any party that requests service pursuant to Bankruptcy Rule  
2002.

**PLEASE TAKE FURTHER NOTICE** that if no responses or objections are received by  
the Objection Deadline, the relief may be granted as requested in the Motion without further notice  
or a hearing.

Dated: February 15, 2022  
Newark, New Jersey

**SAUL EWING ARNSTEIN & LEHR LLP**

By: */s/ Stephen B. Ravin*  
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